



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

September 15, 1997

Ian Webster, Ph.D.
WDIG Project Coordinator
376 S. Valencia
Brea, California 92621

Subject: Waste Materials Disposal Plan, Appendix D, Revision 1.0 -
Removal or Disposal of Drums Containing Unknown Solids
and Liquids at the Waste Disposal, Inc. (WDI) Superfund Site

Dear Mr. Webster:

Regarding the offer made by the Waste Disposal, Inc. Group (WDIG) to the U.S. Environmental Protection Agency (EPA) at the September 10, 1997 Technical Meeting to consolidate into roll top containers the contents of the drums located on the site, the EPA wants to clarify that approval only has been granted to the WDIG to consolidate the purged groundwater and the decontamination water generated at the site into Baker tanks.

While EPA concurs with the WDIG's interests in removing these drums expeditiously, prior to taking action on any other drums the WDIG must submit a detailed description of the proposed activities for EPA approval. The plan for taking action should be incorporated into a revision to the Waste Materials Disposal Plan, Appendix D, Revision 1.0, dated August 1997. Attachment 1 includes a list of comments, which should be addressed by the WDIG. EPA requests that the WDIG submit Revision 2.0 to this Plan by Friday, September 26, 1997.

If you have any questions or need any additional information, please give me a call at (415) 744-2361.

Sincerely,

Andria Benner
Remedial Project Manager

Enclosure

cc:	Pat Hotra, SCAQMD	Darryl Petker, CIWMB
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	Kathy Steuer, Esq., EPA, ORC	Shelby Moore, Esq., WDIG

COMMENTS ON WASTE MATERIALS DISPOSAL PLAN, APPENDIX D, REVISION 1.0

General Comments

1. Removal and disposal of drummed waste materials (solids and liquids) which are not characterized must be done in a phased approach: sampling; consolidation, handling, transport, and disposal. The plan needs to be revised to show the necessary phasing or steps.

Specific Comments

1. Page D-1, Para. 2, Last Sentence. The text states that "Material will be consolidated into roll-off bins prior to the determination of final disposal." Later on page D-2, Section D.2.1, Para. 2, the text states that the drill cuttings from past investigations will be "consolidated in a stockpile area, covered with visqueen and held in place with sandbag weights." As stated in EPA's comments of June 20, 1997, EPA will not approve stockpiling of drill cuttings (currently stored in Area 2) under a visqueen cover for longer than one to two months. While EPA will approve consolidation of the drill cuttings prior to placement in roll tops, the economics may be questionable since it will mean moving the drill cuttings twice. Plan should be revised to indicate that drill cuttings will be disposed of on the site in trenches in the reservoir area (Area 2), while the final remedial remedy is being implemented. Plan should describe how structurally sound versus structurally unsound ("rusted-out") drums will be handled.
2. Page D-2. The Plan describes 5 categories of waste types: Solids; Purged ground water and decontamination water; Personal protection equipment; Steel drums; and Other Debris. There is no section describing solids or liquids in drums or other types of containers which have not been characterized (e.g., drums and containers in Area 7). Add a section describing sampling and analysis procedures for characterizing these unknown waste materials. Include a description of how these materials will be segregated and managed in the short-term and how they will be properly disposed in the long-term.
3. Page D-2, Section D.2.2, Para. 2. EPA's comments of June 20, 1997, stated that sampling and analysis of the purged ground water and the decontamination water was required once it was consolidated into Baker Tanks, so that it could be declassified as a hazardous waste. The Plan does not address this comment. Revise text to indicate this sampling will be conducted from the Baker Tanks and the results submitted to the Regional Water Quality Control Board for its review and approval prior to discharge of this water for dust control.
4. Page D-3, Para. 1. The text states that the decontaminated drums will be crushed and disposed after analysis has been completed. Some of the drums appear to be too rusted or in such deteriorated condition that the drums cannot be decontaminated. In the case of the drums containing drill cuttings in Area 2, some of the drums will fall apart. In the case of the drums containing unknown materials in Area 7, some of the drums cannot be separated from the waste materials or the drums are so rusted that they will disintegrate. In such instances, it appears that the wastes will have to be disposed of with the drum. The Plan needs to describe procedures for dealing with these types of deteriorated drums or containers.